

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

CR 4:21-cr-40026

Plaintiff,

REDACTED INDICTMENT

v.

Receipt and Distribution of  
Child Pornography

CAMERON ALLEN ZEPHIER,

18 U.S.C. §§ 2252A(a)(2)(A),  
2252A(b)(1), and 2253

Defendant.

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The Grand Jury charges:

On or about between May 6, 2020, and September 30, 2020, in the District of South Dakota and elsewhere, the Defendant, Cameron Allen Zephier, did knowingly receive and attempt to receive, any child pornography, as defined in 18 U.S.C. § 2256(8), that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer, all in violation of 18 U.S.C. §§ 2252A(a)(2)(A) and 2252A(b)(1).

**FORFEITURE ALLEGATION**

1. The allegations contained in this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 2253.

2. If convicted of an offense set forth above, Cameron Allen Zephier, the Defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used in the possession, receipt, distribution and production of child pornography. Such property includes, but is not limited to:

1. Apple iPhone with Serial Number: DX3CQQWZHG6W, and IMEI # 354911096731427.

A TRUE BILL:

**NAME REDACTED**

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Foreperson

Dennis R. Holmes  
Acting United States Attorney

By 